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March 3, 2011

**VIA E-FILING**

Ms. Jocelyn D. Boyd  
Chief Clerk of the Commission  
SC Public Service Commission  
P. O. Drawer 11649  
Columbia, SC 29211

RE: Application of Duke Energy Carolinas, LLC for Approval  
Decision to Incur Nuclear Generation Pre-Construction Costs  
DOCKET NO.: 2011-20-E

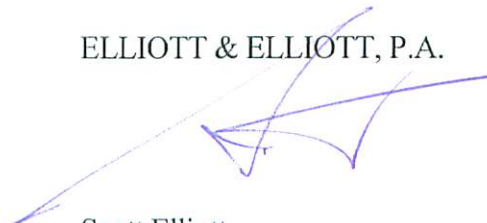
Dear Ms. Boyd:

Enclosed please find for filing a Petition to Intervene filed on behalf of the South Carolina Energy Users Committee ("SCEUC") in the above-captioned matter. By copy of this letter, I am serving all parties of record.

If you have questions, please do not hesitate to contact me.

Sincerely,

ELLIOTT & ELLIOTT, P.A.



Scott Elliott

SE/jcl

Enclosure

cc: All parties of record w/enc.

## STATE OF SOUTH CAROLINA

**BEFORE THE PUBLIC SERVICE COMMISSION**

DOCKET NO. 2011-20-E

IN THE MATTER OF: \_\_\_\_\_)

Amended Project Development Application )

of Duke Energy Carolinas, LLC for Approval)

Pre-Construction Costs )

## PETITION TO INTERVENE

The South Carolina Energy Users Committee (“SCEUC”) hereby petitions the South Carolina Public Service Commission (“Commission”) pursuant to R.103-825 of the Commission’s rules and regulations to intervene and be made a party of record in the above-captioned docket. In support of this Petition, SCEUC would allege as follows:

1. That Duke Energy Carolinas, LLC (“Duke”) has filed an Application with the Commission pursuant to S.C. Code Ann. Section 58-33-225 requesting approval of Duke’s decision to continue to incur additional pre-construction costs of up to \$229 million through December 31, 2013, for a total of \$459 million for its proposed William States Lee, III Nuclear Station in Cherokee County, South Carolina (Lee Nuclear Station).

2. That SCEUC is an association organized in the State of South Carolina, consisting of large consumers of energy which are engaged in various manufacturing enterprises throughout the State.

3. That a number of members of SCEUC purchase and consume substantial amounts of electricity from Duke.

4. That SCEUC and its members have a direct and material interest in the issues to be addressed and resolved by the Commission in this docket and the interests of its members are not adequately represented by the current parties to this proceeding.

5. That given the state of the record at this stage of the proceedings, SCEUC lacks sufficient information to fully develop and state its position in this proceeding at this time.

6. That granting SCEUC's request to be made a party of record in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing its views and concerns can be developed.

7. That the Petitioner is represented by the following counsel in this proceeding:

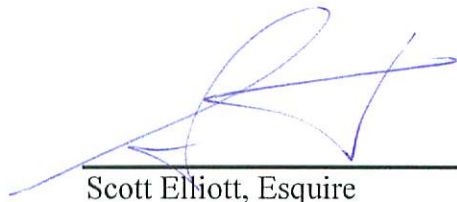


Scott Elliott, Esquire  
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WHEREFORE, Petitioner prays for the following relief:

- a. That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- b. That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and

c. For such other and further relief as is just and proper.



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Attorney for the South Carolina Energy  
Users Committee

Columbia, South Carolina  
March 3, 2011

## CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that (s)he has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: Amended Project Development Application of Duke Energy Carolinas, LLC for Approval of Decision to Incur Nuclear Generation Pre-Construction Costs

DOCKET NO.: 2011-20-E

PARTIES SERVED: Timika Shafeek-Horton, Esquire  
Duke Energy Carolinas, LLC  
P. O. Box 1006/EC03T  
Charlotte, NC 28201

C. Lessie Hammonds, Esquire  
Office of Regulatory Staff  
P. O. Box 11263  
Columbia, SC 29211

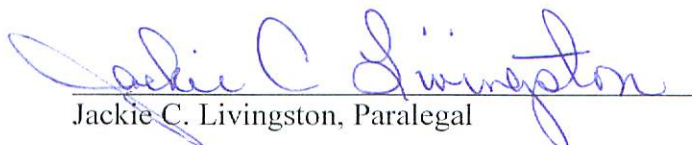
Frank R. Ellerbee, III, Esquire  
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Charles A. Castle, Esquire  
Duke Energy Carolinas, LLC  
P. O. Box 1006, EC03T  
Charlotte, NC 28201-1066

Nanette S. Edwards, Esquire  
Shannon B. Hudson, Esquire  
Courtney D. Edwards, Esquire  
Office of Regulatory Staff  
P. O. Box 11263  
Columbia, SC 29211

PLEADING: PETITION TO INTERVENE BY SOUTH CAROLINA ENERGY USERS COMMITTEE

March 3, 2011

  
Jackie C. Livingston, Paralegal